

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS

IN RE:	§	
	§	
RONCO HOLDINGS, INC.,	§	CASE NO. 18-10511-tmd
	§	
DEBTOR.	§	CHAPTER 11

**RESPONSE TO UNOPPOSED MOTION TO ALLOW AND COMPEL PAYMENT
OF POST-PETITION ADMINISTRATIVE RENT**

COMES NOW P2BINVESTOR INC (“P2Bi”), a secured creditor of the Debtor, and files this its Response to the Unopposed Motion to Allow and Compel Payment of Post-Petition Administrative Rent and Compel Assumption or Rejection of Lease (the “Motion”) [Docket No. 35] filed by KAONOULU RANCH, LLLP (“KAONOULU”) and would show the Court as follows:

1. P2Bi is a secured creditor of the Debtor and is a party to a Landlord’s Subordination Agreement executed by KAONOULU regarding the subject property of this Motion.
2. The Amended Proposed Order submitted late this afternoon grants substantially different relief than that proposed in the Motion.
3. KAONOULU’s Motion sought an administrative claim in the amount of \$50,577.80 and, by the amended order, is now seeking to receive an administrative expense claim in the amount of \$97,881.58, which is essentially double the amount initially sought by the Motion.
4. Additionally, KAONOULU is now being granted certain foreclosure rights and is being awarded a pre-Petition claim in excess of \$300,000.00.
5. KAONOULU filed a Proof of Claim on July 12, 2018 in the amount of \$132,061.18.

6. As this Court ordered in the status conference held on July 31, 2018, any motion to sell must provide for the payment of all administrative claims in full. The Amended Proposed Order should not be entered until all parties have had an opportunity to review the calculation of such claim.

Respectfully submitted,

JONES, ALLEN & FUQUAY, L.L.P.

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By: /s/ Laura L. Worsham

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Attorneys for P2BINVESTOR INC.

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the above Response has been served on the parties set forth below electronically and as otherwise set out, this 3rd day of August, 2018:

Kell C. Mercer

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By Notice of Electronic Filing

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/s/ Laura L. Worsham

Laura L. Worsham